Case: 2:19-cv-01268-KAJ Doc #: 8-2 Filed: 04/29/19 Page: 1 of 2 PAGEID #: 14

EXHIBIT

В

Fuhrer, Lori

From: Fuhrer, Lori

Sent: Wednesday, April 24, 2019 11:41 AM robinmorrison712@gmail.com

Subject: RE: SQN Capital Management v. ST Holdings TOPCP LLC/Seale Moorer

Dear Robin: Thanks for reaching out. I look forward to working with you on this case. Regarding and extension of time, our client is naturally concerned about the dissipation of assets and is hesitant to agree to any extension. However, as a middle road, we are amenable to a shorter extension of 7 days, with the stipulation that proper service of process has been completed and that the court has personal and subject matter jurisdiction and proper venue. If Defendants are going to defend the case on the merits, we are amenable to this extension, but if the intention is to try to raise some procedural roadblocks in an effort to delay the inevitable, we cannot agree. As you can tell, trust is not at an all-time high here. Please let me know your thoughts. I'm happy to discuss by telephone, if you'd prefer. Thanks. Lori

Loriann E. Fuhrer | Director

KEGLER BROWN HILL + RITTER | a legal professional association

65 E. State Street | Suite 1800 | Columbus, OH 43215 office 614.462.5474 | mobile 614.774.6127 |

<u>Ifuhrer@keglerbrown.com</u> <u>www.keglerbrown.com/fuhrer</u>

From: robinmorrison712@gmail.com <robinmorrison712@gmail.com>

Sent: Tuesday, April 23, 2019 3:25 PM

To: Fuhrer, Lori <LFuhrer@keglerbrown.com>

Subject: SQN Capital Management v. ST Holdings TOPCP LLC/Seale Moorer

Hi Loriann,

We are going to be representing both Defendants in this matter. Would you oppose a 21-day extension for us to file a Response to the Complaint? If not, I will file a Motion soon.

Feel free to contact me at 614-668-6739 to discuss.

Thanks,

Robin

Robin L. Morrison, Esq. Billings & Associates LLC PO Box 1557 Westerville, Ohio 43086 Phone 614 332-0624

Confidentiality Notice

The information contained in this e-mail message may be privileged and confidential, and is protected from disclosure. This message is NOT intended for transmission to, or receipt by, anyone other than the named addressee (or a person authorized to receive and deliver it to the named addressee). If the reader of this message is not the intended recipient,

Case: 2:19-cv-01268-KAJ Doc #: 8-2 Filed: 04/29/19 Page: 2 of 2 PAGEID #: 142

or an employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this e-mail message in error, please delete it from your system without copying or forwarding it, and notify the sender of the error by reply e-mail or by calling 614 332-0624.

IRS Disclosure

In compliance with requirements imposed by the Internal Revenue Service, we inform you that any Federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding any penalties under the Internal Revenue Code, or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.